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IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE



In re:

FTX TRADING LTD., et al.,

Custodians and Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Hearing Date: January 25, 2024 at 10:00 a.m. (ET)

OBJECTION TO MOTION OF CUSTODIANS AND DEBTORS DATED DECEMBER 27, 2023 TO ESTIMATE CLAIMS BASED ON DIGITAL ASSETS (DOC 5202)

I, Michael Andrew Lusk of Hinter Rotzberg 2, 6372 Ennetmoos, Switzerland, being a customer of FTX Trading Ltd. adversely affected by the latter's default in failing or refusing to facilitate withdrawal *in specie* of cryptocurrency owned by me, in relation to which FTX Trading Ltd. is the custodian pursuant to the applicable FTX Terms of Service, hereby make objection ("this <u>Objection</u>") to the abovementioned motion of FTX Trading Ltd. and its affiliated custodians and debtors ("the <u>Motion</u>").

A copy of the Motion, including its associated Notice of Motion, Exhibit A, and Exhibit 1, is attached as Exhibit 1 to this Objection.

In support of this Objection, I rely on my Proof of Claim dated September 29, 2023 filed in connection with the present case (the "Proof of Claim"). The Proof of Claim is attached as Exhibit 2 to this Objection.

The Proof of Claim comprises:

- 1. the customer claim form accepted for FTX Trading Ltd. at 15:30 hours (ET) on September 29, 2023 and having confirmation ID 3265-70-ILOCF-915399046 (the "Customer Claim Form");
- the attachment to the Customer Claim Form ("the <u>Customer Claim Form Attachment</u>"), which incorporates:
 - (a) my written statement headed "Customer Claim Made In Objection To FTX Trading Ltd.'s Proposal To Schedule As 'A General Unsecured Claim In An Undetermined Amount' A Claim For Agreed Specified Customer Assets Contractually Held In Trust For The Customer" and dated September 29, 2023 (the "Customer Claim Statement"), which annexes
 - (b) FTX Trading Ltd.'s applicable terms and conditions headed "FTX Terms of Service" and dated May 13, 2022, which is marked as "Annexure 'A'" (the "FTX Terms of Service"); and
 - (c) Screenshot dated November 10, 2022 showing my wallets registered on the FTX Trading Ltd. trading platform, which is marked as "Annexure 'B'" (the "Portfolio Screenshot"); and
- the email from FTX Trading Ltd.'s claims noticing agent, Kroll Restructuring Administration LLC, to me and dated September 29, 2023, attaching the Customer Claim Form and the Customer Claim Form Attachment.

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I. FACTUAL BACKGROUND

- In January 2021 I contracted with FTX Trading Ltd. to use, as its customer, its trading platform at ftx.com subject to contractual terms and conditions set out in the applicable FTX Terms of Service. For this purpose, FTX Trading Ltd. opened for my use a trading account in my name ("the <u>Trading Account</u>").
- 2. A term of the FTX Terms of Service is that FTX Trading Ltd. is entitled to amend the same at any time by posting a revised version of the same on its online trading platform, with an updated revision date. To the best of my knowledge, the FTX Terms of Service dated May 13, 2022 is the revised version of the FTX Terms of Service applicable as at November, 11 2022, being the date on which FTX Trading Ltd. filed a voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware.
- 3. In the Customer Claim Form FTX Trading Ltd. admits, and I agree, that cryptocurrency balances associated with the Trading Account are as follows:

Blockchain Cryptocurrency		Quantity	
Ampleforth	AMPL	0.0119358065309251	
Etherium	ETH	273.3732784383107	
EtheriumPoW	ETHW	273.3732784383107	
Linko	LINK	0.0000000681995	
Solana	SOL	446.826063000	
Tether	USDT	2.547375890	

- 4. According to clause 8.2.6 of the FTX Terms of Service:
 - 8.2.6 All Digital Assets are held in your Account on the following basis:
 - (A) Title to your Digital Assets shall at all times remain with you and shall not transfer to FTX Trading. As the owner of Digital Assets in your Account, you shall bear all risk of loss of such Digital Assets. FTX Trading shall have no liability for fluctuations in the fiat currency value of Digital Assets held in your Account.
 - (B) None of the Digital Assets in your Account are the property of, or shall or may be loaned to, FTX Trading; FTX Trading does not represent or treat Digital Assets in User's Accounts as belonging to FTX Trading.
 - (C) You control the Digital Assets held in your Account. At any time, subject to outages, downtime, and other applicable policies (including the Terms), you may withdraw your Digital Assets by sending them to a different blockchain address controlled by you or a third party.
- 5. Due to FTX Trading Ltd.'s default leading to its application for bankruptcy protection, all crypto assets in the Trading Account have been inaccessible to me since November 2022.
- 6. According to clause 8.2.7 of the FTX Terms of Service:
 - 8.2.7 FTX Trading is under no obligation to issue any replacement Digital Asset in the event that any Digital Asset, password or private key is lost, stolen, malfunctioning, destroyed or otherwise inaccessible.
- 7. FTX Trading Ltd. is in possession of substantial customer assets, many of which have been recovered from entities owned or controlled by FTX Trading Ltd. Due to many egregious acts of default in relation to their handling of customer assets, former senior executive officers of FTX Trading Ltd. have been convicted of, and imprisoned for, fraud offences.
- 8. On September 29, 2023 I filed the Proof of Claim in which I disputed FTX Trading Ltd.'s contention at page 1 of the Customer Claim Form to the effect that my claim against it is in the nature of a "General Unsecured claim in an Undetermined amount". The Proof of Claim shows that my claim against FTX Trading Ltd. is for restitution *in specie* of cryptocurrency held on the Trading Account as at November 11, 2022. In support of the Proof of Claim, the Customer Claim Statement demonstrates that, in relation to the cryptocurrency balances associated with the Trading Account, FTX Trading Ltd. is not in the position of a debtor in possession but rather, under a trust arrangement in relation to which I am the beneficiary, that FTX Trading Ltd. is in the position of the custodian of precisely specified property which is owned by me.
- 9. As at the date of this Objection, I have no notice that FTX Trading Ltd. disputes the matters stated in the Customer Claim Statement filed in support of the Proof of Claim.

II. RELIEF REQUESTED

10. By this Objection, I request that the Court enter an Order requiring, with immediate effect, that FTX Trading Ltd. send each cryptocurrency amount set out in Column I and Column II of Table 1, below, to the corresponding blockchain address specified in Column III of Table 1, below.

Table 1	Table 1			
Column I	Column II	Column III		
Cryptocurrency	Quantity	Blockchain address to be credited		
ETH	273.3732	0x8CD2E3A783c6b33B271288b530E3ecc9aA16B6ea		
ETHW	273.3732	Such blockchain address as Michael Andrew Lusk of Hinter Rotzberg 2, 6372 Ennetmoos, Switzerland shall advise in writing to FTX Trading Ltd.		
SOL	446.8260	7aJfsbvWGcseiRqC3VpQWu4QTeGdcqvP3zwVSmG5r277		

- 11. By this Objection, I further request such other and further relief as is just and proper.
- 12. For avoidance of doubt, the relief requested by this Objection supersedes the relief requested in the Customer Claim Statement.

III. BASIS FOR RELIEF

- A. FTX Trading Ltd. is the custodian not a debtor in possession in relation to cryptocurrency held in the Trading Account on November 11, 2022
- 13. In consequence of the matters stated at paragraphs 3 and 4, above, FTX Trading Ltd. is the custodian in relation to the cryptocurrency held in the Trading Account as at November 11, 2022. FTX Trading Ltd. is not a debtor in possession in this respect because, under the applicable FTX Terms of Service, that cryptocurrency expressly is not loaned to it, and FTX Trading Ltd. expressly does not represent or treat that cryptocurrency as belonging to it.
- 14. The consequences stated at paragraph 13, above, proceed, firstly, from subclause 8.2.6(A) of the FTX Terms of Service, which provides that I am the owner of cryptocurrency held in the Trading Account, and secondly, from subclause 8.2.6(B) of the FTX Terms of Service, which provides that FTX Trading Ltd. is neither the owner of cryptocurrency held in the Trading Account nor a borrower in relation to the same. Subclause 8.2.6(B) further provides that FTX Trading Ltd. "does not represent or treat" cryptocurrency in the Trading Account "as belonging to" FTX Trading Ltd.
- 15. The provisions of the FTX Terms of Service mentioned in paragraph 14, above (and quoted at paragraph 4, above), make it clear that FTX Trading Ltd., being the custodian of cryptocurrency held in the Trading Account as at November 11, 2022, is the trustee under a trust arrangement in relation to which I am the beneficial owner, whereby the trust property comprises the cryptocurrency balances specified at paragraph 3, above.
- B. FTX Trading Ltd. admitted by its long silence following my filing of the Proof of Claim that it is the custodian not a debtor in possession in relation to cryptocurrency held in the Trading Account on November 11, 2022
- 16. As stated at paragraph 9, above, I have no notice to the effect that FTX Trading Ltd. disputes the matters stated in the Customer Claim Statement filed in support of the Proof of Claim, as to which see paragraphs 8 and 13 15, above. It is an accepted principle of law that failure to make a

- reasonably prompt reply to a known objection is an implicit acceptance of the objection. *Qui tacet, consentire videtur*. See e.g. United States v. Irvine, 511 U.S. 224 (1994), per Scalia J.
- 17. It therefore is to be presumed that, in relation to each cryptocurrency balance held in the Trading Account as at November 11, 2022, FTX Trading Ltd. accepts that it is the custodian of those assets under the trust mentioned at paragraph 8 and 15, above. Consequently, FTX Trading Ltd. is obliged to return to me those assets in full and *in specie* prior to any distribution of bankruptcy assets to creditors in this matter, whether secured or unsecured.

C. My claim against FTX Trading Ltd. is neither subject to liquidation nor subject to estimation

- 18. Regarding any customer of FTX Trading Ltd. who failed to file a timely proof of claim in this matter, passing of the September 29, 2023 deadline for filing a proof of claim may have converted such claim from a claim for restitution in specie into a general unsecured claim for an undetermined amount of USD, as is foreshadowed at page 1 of the Customer Claim Form. Such conversion of a claim would occur by the customer's tacit agreement, i.e. the customer's failure to file a timely proof of claim would constitute tacit agreement with the proposal stated in the Customer Claim Form that, absent a proof of claim objecting to the conversion, the customer's claim for restitution in specie of cryptocurrency would be treated as a general unsecured claim for an undetermined amount of USD. Qui tacet, consentire videtur. Compare paragraph 16, above.
- 19. The circumstances mentioned in paragraph 18, above, do not apply in relation to my claim against FTX Trading Ltd. because the Proof of Claim was filed prior to the applicable deadline and it comprises a clear objection to the proposal stated in the Customer Claim Form that my claim be treated as a general unsecured claim for an undetermined amount of USD.
- 20. By the Motion, FTX Trading Ltd. requests the Court to enter an order authorizing it to estimate a USD value in relation to all customer cryptocurrency claims. This Objection does not oppose the making of such an order in connection with the circumstances described in paragraph 18, above. However, the scope of any such order must be so limited as to respect the rights of each customer of FTX Trading Ltd. who, like me, filed a timely proof of claim in terms that oppose the proposal stated in the Customer Claim Form to treat the customer's claim for restitution in specie of cryptocurrency as a general unsecured claim for an undetermined amount of USD.
- D. In connection with my claim, FTX Trading Ltd. is not entitled to rely on its own acts of fraud to assert contractual limitation of its liability in connection with loss, theft, etc. of cryptocurrency
- 21. In the circumstances stated at paragraph 7, above, it must be presumed that any loss, theft, malfunctioning, destruction, or other loss of accessibility which might be applicable in relation to any cryptocurrency in the Trading Account occurred by reason of FTX Trading Ltd.'s own fraudulent conduct.
- 22. Due to its failure to keep sufficiently clear and complete records of its dealings with customer assets, FTX Trading Ltd. is not capable of displacing the presumption stated at paragraph 21, above, by demonstrating that any such loss, theft, malfunctioning, destruction, or other loss of accessibility occurred otherwise than by its own fraudulent conduct. FTX Trading Ltd. therefore cannot be entitled to rely on clause 8.2.7 of the FTX Terms of Service, quoted at paragraph 6, above, in avoidance of its liability to return to me *in specie* cryptocurrency held in the Trading Account on November 11, 2022.

- E. My claim against FTX Trading Ltd. for restitution in specie of cryptocurrency held in the Trading Account on November 11, 2022 has a higher priority than any creditor claim
- 23. As FTX Trading Ltd. is the custodian not a debtor in possession in relation to cryptocurrency held in the Trading Account on November 11, 2022 (paragraphs 13 15, above) and has tacitly admitted this to be so (paragraphs 16 17, above), my claim for restitution *in specie* of cryptocurrency held in the Trading Account on November 11, 2022 proceeds from FTX Trading Ltd.'s obligation to return to me property that I own and already have demanded that it return to me. Particularly considering that FTX Trading Ltd. "does not represent or treat Digital Assets in User's Accounts as belonging to" FTX Trading Ltd." (subclause 8.2.6(B) of the FTX Terms of Service, quoted at paragraph 4, above), it would be unjust and improper to authorize FTX Trading Ltd. now to sell my cryptocurrency for USD and to compensate me with a small fraction of the proceeds obtainable at current market value, as it, by the Motion, proposes to do.
- F. FTX Trading Ltd. possesses the necessary technical skill and knowledge to execute the transfers of cryptocurrency mentioned in the relief requested
- 24. FTX Trading Ltd. formerly operated a cryptocurrency exchange. In that business it routinely transferred cryptocurrency in response to corresponding customer requests. By the present Chapter 11 bankruptcy matter, FTX Trading Ltd. implicitly proposes to resume its former business operations. In these circumstances, it is evident that FTX Trading Ltd. possesses the necessary technical skill and knowledge to execute the transfers of cryptocurrency mentioned in the relief requested at paragraphs 10 12 of this Objection. FTX Trading Ltd. therefore cannot reasonably complain that it is technically incapable of transferring cryptocurrency in the manner indicated in the relief requested herein.

IV. CONCLUSION

25. For the reasons set forth herein, I request the Court to grant the relief sought at paragraphs 10 - 12 of this Objection.

Dated:

January 9, 2024

Ennetmoos, Switzerland

Michael Lusk

Hinter Rotzberg 2

6372 Ennetmoos

Switzerland

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Mallest

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Sent: Tuesday, 9 January 2024 14:55

To: landis@lrclaw.com; brown@lrclaw.com; pierce@lrclaw.com;

dietdericha@sullcrom.com; bromleyj@sullcrom.com; gluecksteinb@sullcrom.com;

kranzleya@sullcrom.com

Subject: In re: FTX TRADING LTD., et al. | United States Bankruptcy Court | Case No.

22-11068 (JTD) | NOTICE OF NEW FILING

Attachments: 20240109

 $_ML_Objection To FTX Trading IncClient Asset Valuation Proposal_With Annexes.pdf$

Dear Sirs and Mesdames,

I hereby serve notice that I will lodge for filing the attached Objection of today's date to FTX Trading Ltd.'s Motion dated December 27, 2023 to estimate claims based on digital assets (Doc 5202).

Kind regards, Michael Lusk

Ennetmoos, Switzerland

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IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

Chapter 11

FTX TRADING LTD., et al., 1

Case No. 22-11068 (JTD)

Debtors.

(Jointly Administered)

Hearing Date: January 25, 2024 at 10:00 a.m. (ET) Obj. Deadline: January 11, 2024 at 4:00 p.m. (ET)

MOTION OF DEBTORS TO ESTIMATE CLAIMS BASED ON DIGITAL ASSETS

FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the "Debtors") hereby submit this motion (this "Motion") for entry of an order, substantially in the form attached hereto as Exhibit A (the "Order"), pursuant to sections 105(a) and 502(c) of title 11 of the United States Code, 11 U.S.C. §§ 101 et seq. (the "Bankruptcy Code"), estimating the value of Claims² in respect of Digital Assets³ and fiat currency, including Customer Entitlement Claims, based on the amounts set forth on Exhibit 1 to the Order (the "Digital Assets Conversion Table") for the purposes of any plan in these Chapter 11 Cases. In support of this Motion, the Debtors rely on (i) the Declaration of Sabrina T. Howell in Support of the Motion of Debtors to Estimate Claims Based on Digital Assets (the "Howell Declaration") and report annexed thereto (the "Howell

The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification numbers are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the *Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 4861], as it may be amended, supplemented or modified (the "Plan").

Digital Assets" as used herein excludes non-fungible tokens ("NFTs"). The Debtors are not seeking to estimate the value of Claims based on NFTs pursuant to this Motion.

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Report"), and (ii) the Declaration of Kevin Lu in Support of the Motion of Debtors to Estimate Claims Based on Digital Assets (the "Lu Declaration"), each filed concurrently herewith, and respectfully state as follows:

PRELIMINARY STATEMENT

- 1. The Debtors continue to make deliberate and substantial progress towards confirmation of a chapter 11 plan and returning the value of the Debtors' assets to customers and other creditors holding Allowed Claims. These Chapter 11 Cases are unique, however, because millions of the Claims submitted and listed on the Debtors' Schedules are based on Digital Assets, and asserted in quantities of Digital Assets. As a result, all such Claims are currently unliquidated. The vast majority of these Claims are Customer Entitlement Claims.
- 2. To provide creditors with recovery estimates, solicit votes on the Plan, and ultimately make Distributions pursuant to the Plan (or any other plan), all Claims based on Digital Assets need to have fair and reasonable value ascribed to them. The liquidation of every individual Claim in respect of a Digital Asset is impractical and unnecessary, and would unduly delay these Chapter 11 Cases. However, all Claims based on Digital Assets share a common feature: the value is derived from the value of the underlying Digital Assets.
- 3. Thus, the Debtors, assisted by Mr. Lu and Dr. Howell, undertook a process to analyze and determine the value of each of the Digital Assets on which Claims are based, as well as those Claims, as of the Petition Date—as required by section 502(b) of the Bankruptcy Code. The result of that work is the proposed Digital Assets Conversion Table, of which the Debtors seek approval pursuant to section 502(c) of the Bankruptcy Code. The Digital Assets Conversion Table provides the basis by which creditors can understand the value of their Claims, and the Debtors can calculate the value of Claims in respect of Digital Assets for voting and

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distribution purposes. In turn, such information derived from the Digital Assets Conversion Table will be provided in a revised Disclosure Statement in order to provide material information to creditors upon which they may evaluate the Plan.

4. The Court has broad discretion in exercising its estimation authority pursuant to section 502(c) of the Bankruptcy Code. Establishing the Digital Assets Conversion Table is an important building block in constructing the Plan and ensuring a fair and value-maximizing resolution of these Chapter 11 Cases for stakeholders. As such, the Motion should be granted and the Digital Assets Conversion Table approved.

FACTUAL BACKGROUND

- 5. On November 11 and November 14, 2022 (as applicable, the "Petition Date"), the Debtors filed with the United States Bankruptcy Court for the District of Delaware (the "Court") voluntary petitions for relief under the Bankruptcy Code. The Debtors continue to operate their businesses and manage their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. Joint administration of the Debtors' cases (the "Chapter 11 Cases") was authorized by the Court by entry of an order on November 22, 2022 [D.I. 128]. On December 15, 2022, the Office of the United States Trustee for the District of Delaware (the "U.S. Trustee") appointed an Official Committee of Unsecured Creditors (the "Committee") pursuant to section 1102 of the Bankruptcy Code [D.I. 231].
- 6. Additional factual background relating to the Debtors' businesses and the commencement of these Chapter 11 Cases is set forth in the *Declaration of John J. Ray III in Support of Chapter 11 Petitions and First Day Pleadings* [D.I. 24], the *Declaration of Edgar W. Mosley II in Support of Chapter 11 Petitions and First Day Pleadings* [D.I. 57], the *Supplemental*

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Declaration of John J. Ray III in Support of First Day Pleadings [D.I. 92] and the Supplemental Declaration of Edgar W. Mosley II in Support of First Day Pleadings [D.I. 93].

- 7. On May 19, 2023, the Court entered the *Order (I)(A) Establishing Deadlines for Filing Non-Customer and Government Proofs of Claim and Proofs of Interest and (B) Approving the Form and Manner of Notice Thereof and (II) Granting Related Relief* [D.I. 1519], setting the non-customer bar date to file proofs of claim against any of the Debtors as June 30, 2023, and the governmental bar date as September 29, 2023.
- 8. On June 28, 2023, the Court entered the *Order (I)(A) Establishing Deadlines for Filing Customer Proofs of Claim, (B) Approving Procedures for Submitting Proofs of Claim and (C) Approving the Form and Manner of Notice Thereof and (II) Granting Related Relief* [D.I. 1793] (the "Customer Bar Date Order"), setting the deadline for customers to file proofs of claim on account of Customer Claims as September 29, 2023.
- 9. As set forth in the Notice of Deadlines Requiring Filing of Customer Proofs of Claim on or Before September 29, 2023 and Customer Proofs of Claim Affected by the Amendment of or Supplement to the Debtors' Schedules of Assets and Liabilities [D.I. 1870] (the "Customer Bar Date Notice"), each customer proof of claim based on cryptocurrencies or digital assets was only required to set forth (i) the number of units or quantity of each cryptocurrency or digital asset and (ii) the program (i.e. Earn, Lend or Stake), if any, applicable to each cryptocurrency or digital asset. The proof of claim form did not contemplate holders of Customer Claims providing a dollar valuation for any of the cryptocurrencies or digital assets. Accordingly, Claims based on Digital Assets are currently scheduled or asserted in proofs of claim only in Digital Asset quantities without dollarized values. Indeed, the Customer Bar Date Notice

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expressly noted that the Debtors would "seek to establish valuations at a later date" with respect to such cryptocurrencies and digital assets.

- 10. On July 31, 2023, the Debtors filed the *Draft Joint Plan of Reorganization* [D.I. 2100]. On October 16, 2023, the Debtors announced and filed the PSA, which includes, among other things, a settlement of the customer property claims litigation filed by the Ad Hoc Committee of Non-US Customers of FTX.com (the "Ad Hoc Committee") and the class action plaintiffs, a preference settlement policy, and a framework for an amended chapter 11 Plan [D.I. 3291].
- Statement for Debtors' Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Affiliated Debtors and Debtors-in-Possession [D.1. 4862] (the "Disclosure Statement"), and (iii) the Motion of Debtors for Entry of an Order (I) Approving the Adequacy of the Disclosure Statement; (II) Approving the Solicitation Packages; (III) Approving the Forms of Ballots; (IV) Establishing Voting, Solicitation and Tabulation Procedures; and (V) Establishing Notice and Objection Procedures for the Confirmation of the Plan [D.1. 4863] (the "Solicitation Procedures Motion"). The Debtors expect to soon file a further amended Plan and Disclosure Statement to incorporate their recently announced settlement with the Joint Official Liquidators of FTX Digital Markets Ltd. [D.1. 4904] and certain other changes, including the Digital Assets Conversion Table requested by this Motion.
- 12. The Digital Assets Conversion Table is integral to advancing the Plan confirmation process. The proposed Solicitation Procedures Order requires that for the purposes of the Solicitation and Voting Procedures, to the extent all or part of any Claim includes Digital Assets, such Digital Assets should be valued and converted to U.S. dollar amounts using the

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Digital Assets amounts set forth on the Debtors' Schedules or in a timely filed proof of claim as converted by the valuations to be set forth in an order by the Court. (*See* Solicitation Procedures Motion, ¶ 56.) A U.S. dollar value for Claims based on Digital Assets is also required for determining projected recovery ranges for such Claims in the Disclosure Statement. (*See* Disclosure Statement, § 1.B.) And section 4.4 of the Plan provides that "[u]nless otherwise expressly provided in the [Order], the value of a Claim in respect of a Digital Asset shall be calculated by converting the value of such Digital Asset into Cash as of the Petition Date utilizing the conversion rates set forth in the Digital Assets Conversion Table." (*See* Plan § 4.4.) Accordingly, by this Motion, the Debtors seek authority to value Claims based on Digital Assets in accordance with the Digital Assets Conversion Table.

JURISDICTION

13. The Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper in the Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicates for the relief requested herein are 28 U.S.C. § 1452 and Bankruptcy Rules 9027 and 9006. Pursuant to rule 9013-1(f) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), the Debtors consent to the entry of a final order or judgment by the Court in connection with this Motion to the extent it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

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RELIEF REQUESTED

14. By this Motion, the Debtors request entry of the Order pursuant to sections 502(c) and 105(a) of the Bankruptcy Code, substantially in the form attached hereto as Exhibit A, estimating Claims based on Digital Assets and fiat currency by approving the Digital Assets Conversion Table to value such Claims, including Customer Entitlement Claims, for purposes of any plan in these Chapter 11 Cases.

BASIS FOR RELIEF

- I. Estimation of the Claims Based On Digital Assets is Necessary Because Individual Liquidation Would Unduly Delay the Administration of the Chapter 11 Case
- 15. Section 502(c) of the Bankruptcy Code provides in relevant part that "there shall be estimated for purposes of allowance under this section . . . any contingent or unliquidated claim, the fixing of which, as the case may be, would unduly delay the administration of the case." 11 U.S.C. § 502(c)(1) (emphasis added). "Claims estimation provides 'a means for a bankruptcy court to achieve reorganization, and/or distributions on claims, without awaiting the results of legal proceedings that could take a very long time to determine." In re AMR Corp., 2021 WL 2954824, at *3 (Bankr. S.D.N.Y. July 14, 2021) (quoting In re Adelphia Bus. Sols., Inc., 341 B.R. 415, 422 (Bankr. S.D.N.Y. 2003); In re RNI Wind Down Corp., 369 B.R. 174, 191 (Bankr. D. Del. 2007) ("The purpose of section 502(c) is to prevent the administration of the debtor's estate from being held hostage by the fixing or liquidation of an unliquidated or contingent claim."); In re Continental Airlines, Inc., 981 F.2d 1450, 1461 (5th Cir. 1993) (noting that two purposes of section 502(c)(1) are to "avoid the need to await the resolution of outside lawsuits to determine issues or liability or amount owed by means of anticipating and estimating the likely outcome of these

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actions" and to "promote a fair distribution to creditors through a realistic assessment of uncertain claims").

16. "Section 502(c) of the Bankruptcy Code is drafted in mandatory terms." *In re G-I Holdings, Inc.*, 323 B.R. 583, 599 (Bankr. D.N.J. 2005). In other words, the Court must estimate claims if it determines that liquidating the contingent or unliquidated claim "would unduly delay the bankruptcy case." *Id.*; *see also In re G-I Holdings, Inc.*, 2006 WL 2403531, at *3 (Bankr. D.N.J. Aug. 11, 2006).

A. Claims Based On Digital Assets Are Unliquidated.

- 17. The Bankruptcy Code does not define the term "unliquidated" for the purpose of section 502(c). However, courts have defined "[a]n unliquidated claim [as] a 'claim in which the amount owed has not been determined." *In re Energy Future Holdings Corp.*, 531 B.R. 499, 515 n.70 (Bankr. D. Del. 2015) (citing *In re RNI Wind Down Corp.*, 369 B.R. at 183; see also *In re Akorn, Inc.*, 2021 WL 4306222, at *13 (D. Del. Sept. 22, 2021) (same), *aff'd, In re Akorn Inc.*, 2022 WL 17222417 (3d Cir. Nov. 25, 2022).
- 18. The Claims based on Digital Assets are unliquidated. Digital Assets include any digital representation of value or units that are issued or transferable using distributed ledger or blockchain technology, including stablecoins and cryptocurrency. In other words, Claims on account of Digital Assets are based on the value of the underlying Digital Asset and do not have a separate determined value in U.S. dollars. With respect to Customer Entitlement Claims specifically, as set forth above, customers were only required to provide the number of units or quantity of each Digital Asset in respect of their Customer Entitlement Claim on their proofs of claim; customers were not required to set forth a U.S. dollar value. Any U.S. dollar value included in a filed proof of claim for Claims on account of Digital Assets could only be such customer's estimate. Accordingly, Claims based on Digital Assets are unliquidated.

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B. Liquidating the Customer Claims Would Unduly Delay These Chapter 11 Cases.

- 19. Bankruptcy courts use estimation to avoid unduly delaying cases where an indeterminate unliquidated claim must be liquidated. *E.g.*, *In re G-1 Holdings, Inc.*, 323 B.R. at 599; *see also In re Interco Inc.*, 137 B.R. 993, 998 (Bankr. E.D. Mo. 1992) (estimating retirement fund's ERISA claim where deferring "determination of this claim to arbitration, would leave a void in the Debtors' plan formulation equation . . . [and] it would be difficult for this Court to determine the feasibility of a plan"); *In re Lane*, 68 B.R. 609, 611 (Bankr. D. Haw. 1986) (granting motion to estimate where unliquidated claim delayed plan confirmation).
- 20. The Debtors need to be able to calculate the dollarized value of Claims based on Digital Assets for Plan solicitation and voting purposes. Claims based on Digital Assets are currently scheduled or asserted in proofs of claim only in quantities of Digital Assets without dollarized values. The Debtors cannot solicit votes on the Plan until these Claims have a U.S. dollar value. Additionally, as the Court noted at the hearing on December 13, 2023, "it is the customers and the creditors here who need to get paid." (Dec. 13, 2023 Hr'g Tr. 56:19-20.) That is not possible until Claims based on Digital Assets have been ascribed values in U.S. dollars such that the Debtors can make dollarized distributions to customers and other creditors under the Plan.⁴
- 21. Furthermore, the Debtors need to be able to provide information in the Disclosure Statement regarding anticipated recoveries under the Plan to permit creditors the opportunity to evaluate the Plan and cast an informed vote. Thus, the value of the Claims based on Digital Assets must be valued as of the Petition Date. Without the ability to do so on an omnibus basis, solicitation and distributions—and thus these Chapter 11 Cases—would be unduly delayed.

The imbalance between Claims based on Digital Assets and that reflected on the Debtors' balance sheets means that the Debtors are unable to consider making in-kind Distributions. (Howell Rep. ¶¶ 3, 13.)

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Liquidation of each of the millions of Claims in respect of Digital Assets would be prohibitively costly and time-consuming. The Plan therefore expressly requires that Claims based on Digital Assets be valued pursuant to the conversion rates set forth in the Digital Assets Conversion Table if and as approved by the Court. (*See* Plan, Art. 4.4.) Once the Digital Assets Conversion Table is established, it would apply to any plan in these Chapter 11 Cases.

22. It is simply not realistic that the Debtors would be able to liquidate every one of the millions of Claims based on Digital Assets on any timeline that would not constitute undue delay of these Chapter 11 Cases and distributions to creditors. It would also be impossible for the Debtors to launch solicitation on any chapter 11 plan without an understanding of the value of Claims on account of Digital Assets for voting purposes and for determining projected recovery ranges for such Claims and all other Claims against the Debtors. Accordingly, liquidation of the Claims based on Digital Assets would unduly delay, and potentially preclude, distributions under any plan in these Chapter 11 Cases. Valuation of such Claims based on the Digital Assets Conversion Table is appropriate.

II. The Court Should Approve the Digital Asset Conversion Table

estimating the value of a claim. *See Kool, Mann, Coffee & Co.* v. *Coffey*, 300 F.3d 340, 356 (3d Cir. 2002). Congress intended estimation to be undertaken initially by bankruptcy judges, using whatever method is best suited to the contingencies at issue. *See Bittner v. Borne Chem. Co., Inc.*, 691 F.2d 134, 135 (3d Cir. 1982) ("Despite the lack of express direction on the matter, we are persuaded that Congress intended the procedure to be undertaken initially by the bankruptcy judges, using whatever method is best suited to the particular contingencies at issue."). Accordingly, this Court has broad discretion to choose whatever method it deems best-suited to the particular circumstances to estimate the valuation of Claims based on Digital Assets. *See In*

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re Innovasystems, Inc., 2014 WL 7235527, at *7 (Bankr. D.N.J. Dec. 18, 2014) ("There is no particular method to be employed in estimating a claim. Estimation decisions therefore fall within the discretion of the trial judge.") (citations omitted); *G-I Holdings*, 323 B.R. at 599 ("In general, a bankruptcy court has discretion to determine the appropriate method of estimation in light of the particular circumstances of the bankruptcy case before it."). Estimation requires only "sufficient evidence on which to base a reasonable estimate of the claim." *Bittner*, 691 F.2d at 135. "There are no other limitations on the court's authority to evaluate the claim save those general principles which should inform all decisions made pursuant to the Bankruptcy Code" and the legal rules which govern the ultimate value of the claim. *G-I Holdings*, 323 B.R. at 599 (citing *Bittner*, 691 F.2d at 136).

24. An estimation, by definition, is an approximation and necessarily involves comparing a known or established quantum of data to the thing being estimated. *In re Fed.-Mogul Glob., Inc.*, 330 B.R. 133, 155 (D. Del. 2005). Courts recognize they are dealing with uncertainties and are attempting to make predictions which are themselves based upon predictions and assumptions. *Owens Corning v. Credit Suisse First Boston*, 322 B.R. 719, 721 (D. Del. 2005). Thus, courts consider all factors and circumstances surrounding the claims, but do not seek to estimate claims with mathematical precision. *See In re Armstrong World Indus., Inc.*, 348 B.R. 111, 124 (D. Del. 2006) ("[T]he Court will not seek to analyze the estimations before it for mathematical precision, nor will it attempt to reach its own exact number.").

A. Section 502(b) of the Bankruptcy Code Requires that the Claims be Valued as of the Petition Date.

25. Section 502(b) of the Bankruptcy Code governs the valuation of claims. That statute provides that "the court, after notice and a hearing, shall determine the amount of such claim in lawful currency of the United States as of the date of the filing of the petition." 11 U.S.C.

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§ 502(b) (emphasis added); see also In re Glob. Power Equip. Grp. Inc., 2008 WL 435197, at *5 (Bankr. D. Del. Feb. 14, 2008) (noting that it is "502(b)'s unambiguous design" to "[]freeze the value of a claim").

- 26. In accordance with section 502(b), claims based on digital assets have been valued as of the applicable petition date in other large cryptocurrency cases. *See*, *e.g.*, *In re BlockFi Inc.*, Case No. 22-19361 (Bankr. D.N.J. Aug. 8, 2023), D.I. 1309 ("As is required by section 502(b) of the Bankruptcy Code, each Account Holder's Claim is determined by the fair market value of the Digital Assets (based in United States dollars pursuant to the Digital Assets Conversion Table) held by the Account Holder at the Debtors as of the Petition Date at 11.59 p.m. UTC."); *In re Voyager Digital Holdings*, Case No. 22-10943 (Bankr. S.D.N.Y. Mar. 5, 2023), D.I. 1138 ("Account Holder Claims shall be valued in U.S. dollars as of the Petition Date consistent with section 502(b) of the Bankruptcy Code."); *In re Celsius Network LLC*, Case No. 22-10964 (Bankr. S.D.N.Y. Sept. 27, 2023), D.I. 3577 ("Unless otherwise expressly provided herein, the value of a Claim denominated in Cryptocurrency shall be calculated by converting the value of the Claim into Cash as of the Petition Date").
- 27. Determining the value of Digital Assets can be analogized to determining the value of foreign currency. When converting claims denominated in non-U.S. currency to U.S. dollars, courts have applied the currency exchange rate as of the applicable petition date. The *In re Global Power Equipment* court noted that this "prevents the value of a claim from fluctuating by freezing the claim as of the petition date and converting it to United States dollars. The amount of the claim will not change, even . . . if the applicable currency rises or falls in relation to dollars." *In re Glob. Power Equip. Grp., Inc.*, 2008 WL 435197, at *5 (quoting *In re Aaura, Inc.*, 2006 WL 2568048, at *4 n. 5 (Bankr. N.D. Ill. Sept. 1, 2006)); *see also In re RCS Capital Development*,

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LLC, 2013 WL 3618550, at *13 (9th Cir. July 16, 2013) (concluding "that the bankruptcy court erred in calculating the exchange rate [for purposes of claim allowance] by using the breach date rather than the petition date as mandated by § 502(b)"); In re USGen New England, Inc., 429 B.R. 437, 492 (Bankr. D. Md. 2010) (concluding that, "under the plain meaning of 11 U.S.C. § 502(b)," the appropriate exchange rate to convert a claim to U.S. dollars is that in effect on the petition date).

28. Accordingly, the Debtors' experts, Dr. Howell and Mr. Lu, have worked together to propose values for the Digital Assets, in order to enable the Debtors to estimate the Claims based on such Digital Assets through application of the Digital Assets Conversion Table, as of the Petition Date.

B. The Values Set Forth in the Digital Assets Conversion Table Provide the Basis for Reasonable Valuation of the Digital Assets Claims.

29. The Digital Assets Conversion Table provides a fair and reasonable estimate of the value of the Digital Assets as of the Petition Date on which Claims are based and thus creditor Claims associated with those assets. As these Chapter 11 Cases have revealed, the Debtors did not hold all of the Digital Assets claimed by customers and other creditors. Dr. Howell notes that, as of the Petition Date, the Debtors held 577 of 1,321 unique digital assets that have customer Claims associated with them. (Howell Rep. ¶ 13.) As a result, the Plan provides for Claims in respect of Digital Assets to be calculated by converting the value of the Digital Asset into Cash as of the Petition Date using the rates set forth in the Digital Assets Conversion Table, and making Distributions in Cash. (See Plan § 4.4.) To make Distributions in Cash to creditors, whether on the Petition Date or now, the Debtors would need to liquidate all Digital Assets. Thus, the Petition Date actual values of the Digital Assets, and therefore the Claims in respect of those assets, need to reflect this reality.

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- 30. To estimate the fair value of each of the Digital Assets, a dataset was compiled consisting of, among other things, coin and token prices (including stablecoin) sourced from Coin Metrics, Inc. ("Coin Metrics"). As detailed in the Lu Declaration, prices developed by Coin Metrics are widely relied upon within the cryptocurrency industry. (See Lu Decl. ¶ 15.) "Coin Metrics' clients use the Coin Metrics Prices for research, for accounting and financial reporting, to settle financial contracts, to create financial products, for display purposes, and to publish on-chain via blockchain oracles." (Id.) The Lu Declaration describes in detail the process by which Coin Metrics determines spot pricing for coins and tokens. (Id. ¶ 31.) Mr. Lu, the Director of Data Science & Product at Coin Metrics, has performed routine examinations on the performance of Coin Metrics Prices (as defined in the Lu Declaration) over the past five years and determined that they consistently perform well, even during times of market volatility and stress. (Id. ¶ 16.) Because tokenized stocks, leveraged tokens and futures were derivatives specific to FTX, prices for tokenized stocks and futures are sourced from the last trade price from the order books for the Debtors' exchanges, and prices of leveraged tokens are sourced from the ETF snapshot table, which was constructed by the Debtors to capture the market price of underlying contracts for each leveraged token every 15 seconds. (Howell Rep. App'x C ¶ 2.)
- 31. Dr. Howell analyzed and determined whether adjustments needed to be made to those Petition Date prices due to the likely effect of (i) an orderly liquidation of the Debtors' holdings of each Digital Asset claimed by creditors, (ii) the fact that certain Digital Assets were not marketable (e.g., locked tokens), and/or (iii) the nature of the asset (e.g., equity-like). (Howell Rep. \P 4.)
- 32. As set forth in detail in the Howell Report, Dr. Howell determined that in an orderly liquidation commencing on the Petition Date, certain of the Digital Assets would likely

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have been sold at average prices below the prevailing market prices. (*Id.* ¶ 13.) Dr. Howell concluded that an asset liquidation discount exceeding 10 percent of the market price would affect 71 of the Digital Assets held by the Debtors and claimed by customers. (*Id.* ¶¶ 13, 63-71.) No asset liquidation discount is necessary for fiat currency positions, stablecoins, tokenized stocks, or futures. (*Id.* ¶ 13.)

- 33. Dr. Howell further determined that an additional discount for lack of marketability is appropriate for locked or otherwise non-marketable Digital Assets. (*Id.* ¶¶ 14, 72-84.) Finally, Dr. Howell concluded that FTT and certain FTX equity claims have zero fundamental value. (*Id.* ¶ 15, 85-87.)
- 34. Exhibit 6 to the Howell Report aggregates the comprehensive list of estimated values for Digital Assets on which customer Claims are based. (*Id.* ¶ 88.) This list is the proposed Digital Assets Conversion Table that is Exhibit 1 to the Order.
- 35. The Debtors submit that the values of Digital Assets set forth in the Digital Assets Conversion Table are fair and reasonable for estimation of Claims based on those Digital Assets pursuant to section 502(c) of the Bankruptcy Code. The Motion should therefore be granted.

NOTICE

36. Notice of this Motion has been provided to: (a) the U.S. Trustee; (b) counsel to the Committee; (c) the Securities and Exchange Commission; (d) the Internal Revenue Service; (e) the United States Department of Justice; (f) the United States Attorney for the District of Delaware; (g) holders of Claims based on Digital Assets; and (h) to the extent not listed herein, those parties requesting notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be provided.

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RESERVATION OF RIGHTS

37. Nothing contained herein is intended or should be construed as (a) an admission as to the validity or priority of any claim, equity interest or lien against the Debtors, (b) a waiver of the Debtors' rights to subsequently dispute such claim, equity interest or lien on any grounds, (c) a promise or requirement to pay any prepetition claim, (d) an implication or admission that any particular claim is of a type specified or defined in the Motion or the Order, (e) a request or authorization to assume any prepetition agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code, or (f) a waiver of the Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable law.

CONCLUSION

WHEREFORE, for the reasons set forth herein, the Debtors respectfully request that the Court (a) enter the Order, substantially in the form attached hereto as <u>Exhibit A</u>, and (b) grant such other and further relief as is just and proper.

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Dated: December 27, 2023 Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Matthew R. Pierce

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Counsel for the Debtors and Debtors-in-Possession

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IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

Chapter 11

Case No. 22-11068 (JTD)

Debtors.

(Jointly Administered)

Hearing Date: January 25, 2024 at 10:00 a.m. (ET)

NOTICE OF MOTION

Objection Deadline: January 11, 2024 at 4:00 p.m. (ET)

TO: (a) the U.S. Trustee; (b) counsel to the Committee; (c) the Securities and Exchange Commission; (d) the Internal Revenue Service; (e) the United States Department of Justice; (f) the United States Attorney for the District of Delaware; (g) holders of Claims based on Digital Assets; and (h) to the extent not listed herein, those parties requesting notice pursuant to Bankruptcy Rule 2002.

On December 27, 2023, FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the "<u>Debtors</u>") filed the *Motion of Debtors to Estimate Claims Based on Digital Assets* (the "Motion").

Objections, if any, to the relief requested in the Motion must be filed with the United States Bankruptcy Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **January 11, 2024 at 4:00 p.m. (ET).**

At the same time, you must also serve a copy of the objection upon the undersigned counsel so as to be received no later than 4:00 p.m. (ET) on January 11, 2024.

A HEARING ON THE MOTION WILL BE HELD ON JANUARY 25, 2024 AT 10:00 A.M. (ET) BEFORE THE HONORABLE JOHN T. DORSEY, UNITED STATES BANKRUPTCY COURT JUDGE, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 5th FLOOR, COURTROOM NO. 5, WILMINGTON, DELAWARE 19801.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

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Dated: December 27, 2023 Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Matthew R. Pierce

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Counsel for the Debtors and Debtors-in-Possession

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EXHIBIT A

Proposed Order

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IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
FTX TRADING LTD., et al., 1	Case No. 22-11068 (JTD)
Debtors.	(Jointly Administered)
	Ref No

ORDER GRANTING MOTION OF DEBTORS TO ESTIMATE CLAIMS BASED ON DIGITAL ASSETS

Upon the motion (the "Motion")² of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the "Debtors") for entry of an order (the "Order") estimating Claims based on Digital Assets and fiat currency, including Customer Entitlement Claims, based on the amounts set forth in the Digital Assets Conversion Table for the purposes of any plan in these Chapter 11 Cases; and this Court having jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Motion in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Motion and the relief requested therein has

The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Motion.

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been provided in accordance with the Bankruptcy Rules and the Local Rules, and that no other or further notice is necessary; and objections (if any) to the Motion having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Motion and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the Debtors and their estates; and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

- 1. The Motion is GRANTED as set forth herein.
- 2. The Debtors are authorized to determine the value of Claims based on Digital Assets and fiat currency, for the purposes of any plan in these Chapter 11 Cases, based on the values set forth in the Digital Assets Conversion Table attached hereto as Exhibit 1.
- 3. Nothing contained in the Motion or any actions taken pursuant to this Order are intended or should be construed as: (a) an admission as to the validity of any particular claim against the Debtors, (b) a waiver of the Debtors' rights to dispute any particular claim on any grounds, (c) a promise or requirement to pay any particular claim, (d) an implication or admission that any particular claim is of a type specified or defined in this Motion or any order granting the relief requested by this Motion, (e) a request or authorization to assume any agreement, contract or lease pursuant to section 365 of the Bankruptcy Code, or (f) a waiver or limitation of the Debtors' rights under the Bankruptcy Code or any other applicable law.
- 4. The Debtors are authorized and empowered to execute and deliver such documents and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

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	5.	This Cou	rt shall	retain jurisdiction with respect to any matters, claims,	
rights or disp	ghts or disputes arising from or related to the Motion or the implementation of this Order.				
Dated:			, 2024		
Wilt	nington,	Delaware		The Honorable John T. Dorsey United States Bankruptcy Judge	

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EXHIBIT 1

Digital Assets Conversion Table

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	Asset	Price
	[A]	[B]
		urrency
1.	ARS	\$0.0062360
2.	AUD	\$0.6619000
3.	BRL	\$0.1871000
4.	CAD	\$0.7506000
5.	CHF	\$1.0380000
6.	CNY	\$0.1391000
7.	EUR	\$1.0210000
8.	GBP	\$1.1692000
9.	GHS	\$0.0693240
10.	HKD	\$0.1275000
11.	IDR	\$0.0000637
12.	INR	\$0.0124090
13.	JPY	\$0.0070930
14.	MXN	\$0.0517670
15.	PHP	\$0.0171810
16.	SGD	\$0.7235000
17.	TRY	\$0.0540910
18.	USD	\$1.0000000
19.	VND	\$0.0000400
20.	XOF	\$0.0015310
21.	ZAR	\$0.0575800
		ecoins
22.	AMPL	\$0.9668414
23.	ANCT**	\$0.000000
24.	BRZ	\$0.1562968
25.	BUSD	\$0.9999760
26.	DAI	\$0.9997000
27.	EUROC	\$1.0265000
28.	EURT	\$1.0248257
29.	FRAX	\$0.9880101
30.	GUSD	\$0.9978045
31.	GYEN	\$0.0071050
32.	HUSD**	\$0.000000
33.	IDRT	\$0.0000634
34.	NDAU	\$15.5416983
35.	PAR	\$1.0258451
36.	PAXG	\$1,753.4508600
37.	RSV	\$0.9969920
38.	SAI**	\$0.000000
39.	TRYB	\$0.0509070
40.	TUSD	\$0.9978553
41.	USDC	\$1.000000
42.	USDF	\$1.0000000
43.	USDP	\$0.9990984
10.		
44.	USDS	\$0.9950000

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	Asset	Price
	[A] Stablecoin ([B]
46.	USTC	\$0.0239415
47.	XAUT	\$1,757.4000000
48.	XIDR	\$0.0000645
49.	XSGD	\$0.7082000
50.	ZUSD	\$1.0000000
	Remaining Cryptocurrencies	and Tokens (excl. FTT)
51.	IINCH	\$0.5506265
52.	1WO**	\$0.000000
53.	AAVE	\$63.9206190
54.	ABBC	\$0.1642675
55.	ABEY	\$0.6159533
56.	ADA	\$0.3497920
57.	ADH**	\$0.0000000
58.	AFCWIN-SB-2021	\$0.000000
59.	AGLD	\$0.2463000
60.	AKRO	\$0.0026846
61.	ALBT	\$0.0478631
62.	ALCX	\$17.5644480
63.	ALEPH*	\$0.0505381
64.	ALGO	\$0.2959040
65.	ALICE	\$1.1828905
66.	ALPHA	\$0.0912154
67.	ALX**	\$0.0000000
68.	AMLT**	\$0.0000000
69.	AMN**	\$0.0000000
70.	ANC	\$0.0531424
71.	ANW	\$0.0007285
72.	APE	\$3.1755724
73.	APT	\$4.7424485
74.	AR	\$9.5507643
75.	ARE**	\$0.0000000
76.	ARST**	\$0.0000000
77.	ARV	\$0.0001056
78.	ASD*	\$0.0544898
79.	ASM	\$0.0160900
30.		\$0.0024908
81.	ATOM	\$11.5991618
32.	AUDIO	\$0.1566829
33.	AURY*	\$0.4435395
84.	AVAX	\$14.1912756
35.	AXS	\$6.8561913
36.	BAAS	\$0.0005289
87.	BADGER	\$2.6147338
38.	BAL	\$5.2393950
89.	BAND	\$2.2614453
90.	BAO*	\$0.0000828

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	Asset	Price	
[A]		[B]	
	Remaining Cryptocurrencies a	nd Tokens (excl. FTT) (Cont.)	
91.	BAR	\$3.9021409	
92.	BAT	\$0.2526885	
93.	ВСН	\$102.2131116	
94.	BCHA	\$0.0000300	
95.	BEAM	\$0.1138695	
96.	BERRY	\$0.0006108	
97.	BF_POINT**	\$0.000000	
98.	BFC	\$0.0738605	
99.	BICO	\$0.2864203	
100.	BIFI	\$0.0068162	
101.	BIT	\$0.3165593	
102.	BLT*	\$0.0296820	
103.	BMC**	\$0.000000	
104.	BNB	\$286.5200580	
105.	BNT	\$0.3792324	
106.	BOBA*	\$0.1655042	
107.	BRC**	\$0.000000	
108.	BRLT**	\$0.000000	
109.	BSV	\$38.2825128	
110.	BTC	\$16,871.6300000	
111.	BTCV	\$2.5096431	
112.	BTRN**	\$0.0000000	
113.	BTT	\$0.000007	
114.	C98	\$0.2040890	
115.	CAN	\$0.0004910	
116.	CAPS	\$0.0086027	
117.	CEL	\$0.6219474	
118.	CHI*	\$0.1126626	
119.	CHR	\$0.1122728	
120.	CHZ	\$0.2197552	
121.	CIM*	\$0.000000	
122.	CITY	\$4.6107138	
123.	CLRX*	\$0.000000	
124.	CLV	\$0.0598594	
125.	CMCT**	\$0.0000000	
126.	COMP	\$37.9232400	
127.	CONV	\$0.0005770	
128.	COPE*	\$0.0048746	
129.	COT*	\$0.0185909	
130.	CPH*	\$0.0226642	
131.	CQT	\$0.0874388	
132.	CRE	\$0.0028662	
133.	CREAM	\$6.8911210	
134.	CRO	\$0.0875500	
135.	CRPT	\$0.0782117	
136.	CRT*	\$0.0912037	
137.	CRV	\$0.6516809	
107,	Cat 7	\$0.0010009	

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	Asset	Price
	[A]	[B]
	Remaining Cryptocurrencies	and Tokens (excl. FTT) (Cont.)
138.	CTK	\$0.7734423
139.	CTX	\$2.2718017
140.	CUDOS	\$0.0034291
141.	CUSDT	\$0.0218002
142.	CVC	\$0.0911835
143.	CVX	\$4.0218594
144.	DACS**	\$0.0000000
145.	DAG	\$0.0491076
146.	DASH	\$35.5184641
147.	DAWN	\$0.7468876
148.	DENT	\$0.0006846
149.	DEXA	\$0.0000213
150.	DFL*	\$0.0008323
151.	DIA	\$0.2999928
152.	DMG*	\$0.0075960
153.	DODO	\$0.1128715
154.	DOGE	\$0.0828523
155.	DOT	\$5.6705792
156.	DRG**	\$0.000000
157.	DS*	\$0.000000
158.	DYDX	\$1.9869782
159.	EARTH**	\$0.000000
160.	ECH**	\$0.000000
161.	EDEN	\$0.0804372
162.	EGLD	\$45.2084940
163.	ELY**	\$0.000000
164.	EMB*	\$0.0147266
165.	ENJ	\$0.3445027
166.	ENS	\$12.2252550
167.	EOS	\$0.9051769
168.	ETC	\$21.0673578
169.	ETH	\$1,258.8400000
170.	ETHW	\$4.1505988
171.	ETN	\$0.0023543
172.	EUL*	\$5.2959756
173.	EWT	\$3.4440290
174.	EZT**	\$0.000000
175.	FCT	\$0.5845263
176.	FDX**	\$0.000000
177.	FIDA*	\$0.1456669
178.	FIL	\$4.3670766
179.	FIO	\$0.0300062
180.	FLEX**	\$0.0000000
181.	FLIXX*	\$0.000000
182.	FLOKI	\$0.000078
183.	FRONT	\$0.1701556
184.	FTM	\$0.1917738

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	Asset	Price
	[A]	[B]
	Remaining Cryptocurrencies and To	
185.	FTX	\$0.0036174
186.	FUSE	\$0.0678327
187.	FXS	\$5.1236807
188.	GAL	\$1.5049689
189.	GALA	\$0.0308076
190.	GALFAN	\$1.6386832
191.	GARI	\$0.0375240
192.	GAT**	\$0.0000000
193.	GATE**	\$0.000000
194.	GEN**	\$0.0000000
195.	GENE*	\$1.2467461
196.	GET	\$0.7966969
197.	GLMR	\$0.3835063
198.	GMT	\$0.3851205
199.	GMX	\$32.5640874
200.	GODS	\$0.2403136
201.	GOG*	\$0.0847262
202.	GOM2	\$0.0045210
203.	GRNC*	\$0.0794655
204.	GRT	\$0.0644695
205.	GST	\$0.0259475
206.	GT	\$3.8283511
207.	GXT	\$0.0015052
208.	GZE**	\$0.000000
209.	GZIL*	\$4.8458171
210.	HBAR	\$0.0471047
211.	HBB	\$0.0645693
212.	HEART	\$0.0044909
213.	HERO	\$0.0040153
214.	HGET	\$0.3483396
215.	HMT*	\$0.0429807
216.	HNT	\$2.8245828
217.	HOLY*	\$1.1335357
218.	HOT**	\$0.000000
219.	HT	\$5.6096533
220.	HUM	\$0.0753202
221.	HXRO*	\$0.0360251
222.	HYDRO*	\$0.000000
223.	IDH*	\$0.0002662
224.	IGNX**	\$0.000000
225.	ILK**	\$0.000000
226.	IMX	\$0.4485000
227.	IND**	\$0.0000000
228.	INDI*	\$0.1057637
229.	INDI IEO TICKET**	\$0.000000
230.	INTER	\$2.2220025
231.	IP3*	\$0.2490543

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	Asset	Price
	[A]	[B]
	Remaining Cryptocurrencies at	
232.	IPSX**	\$0.0000000
233.	IXT**	\$0.0000000
234.	JET*	\$0.0536241
235.	JOE	\$0.1576808
236.	JST	\$0.0226663
237.	KBTT	\$0.0007129
238.	KIN*	\$0.000080
239.	KLAY	\$0.1792372
240.	KLUNC*	\$0.1539537
241.	KMD	\$0.1879196
242.	KNC	\$0.5928001
243.	KNCL	\$0.5928001
244.	KRL	\$0.2927662
245.	KSHIB	\$0.0097500
246.	KSM	\$25.9275204
247.	KSOS	\$0.0001771
248.	LALA**	\$0.000000
249.	LBL	\$0.0042605
250.	LCX	\$0.0482000
251.	LDC**	\$0.000000
252.	LDO	\$1.1764306
253.	LEND**	\$0.000000
254.	LEO	\$4.0838828
255.	LIKE	\$0.0041486
256.	LINA	\$0.0061216
257.	LINK	\$6.7932499
258.	LND*	\$0.000000
259.	LOOKS	\$0.1468043
260.	LOOM	\$0.0439616
261.	LPT	\$7.5747441
262.	LRC	\$0.2596744
263.	LTC	\$60.6106000
264.	LTX	\$0.3110735
265.	LUA*	\$0.0114964
266.	LUNA2	\$1.6770056
267.	LUNC*	\$0.0001540
268.	MAGIC*	\$0.2456470
269.	MAID	\$0.1184386
270.	MANA	\$0.4919000
271.	MAPS*	\$0.0000000
272.	MARX	\$0.0089775
273.	MASK	\$3.3033138
274.	MATH*	\$0.0980750
275.	MATIC	\$1.0265325
276.	MBS	\$0.0898182
277.	MCB	\$4.3032898
278.	MCO**	\$0.0000000

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	Asset	Price
	[A]	[B]
	Remaining Cryptocurrencies and	
279.	MEDIA*	\$2.2217798
280.	MER*	\$0.0051965
281.	MGO**	\$0.0000000
282.	MIMO	\$0.0142254
283.	MIOTA	\$0.2228489
284.	MITH	\$0.0145306
285.	MITX	\$0.0038093
286.	MKR	\$780.1942307
287.	MNGO*	\$0.0088006
288.	MNR**	\$0.0000000
289.	MOB	\$0.6213997
290.	MPLX*	\$0.0500605
291.	MRK**	\$0.0000000
292.	MSOL	\$16.0000000
293.	MSRM*	\$155,146.7074632
294.	MT	\$0.0001984
295.	MTA	\$0.0388458
296.	MTC*	\$0.0648582
297.	MTL	\$0.6666573
298.	MVL	\$0.0034930
299.	MYC*	\$0.0240728
300.	NEAR	\$2.1160000
301.	NEO	\$6.7363650
302.	NEXO	\$0.7285254
303.	NFCWIN-SB-2021	\$1.0000000
304.	NII	\$0.0003073
305.	NPLC*	\$0.000037
306.	NPXS**	\$0.000000
307.	NUC*	\$0.000000
308.	NUM	\$0.0403188
309.	OAX	\$0.0916656
310.	OKB	\$19.0903594
311.	OMG	\$1.2318000
312.	ONT	\$0.1763431
313.	ORBS	\$0.0246122
314.	ORCA	\$0.4958000
315.	OXY*	\$0.000000
316.	PAI	\$0.0002740
317.	PAL**	\$0.0000000
318.	PCI	\$0.2461043
319.	PEOPLE	\$0.0320352
320.	PERI	\$0.0761159
321.	PERP	\$0.4211518
322.	PLA	\$0.1956041
323.	PLG*	\$0.0002596
324.	PLI	\$0.0530000
325.	PMA	\$0.0000183

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	Asset	Price
	[A]	[B]
	Remaining Cryptocurrencies and To	
326.	POLIS*	\$0.1772295
327.	PORT*	\$0.0238768
328.	POWR	\$0.1392196
329.	PPL**	\$0.0000000
330.	PPP**	\$0.0000000
331.	PRISM	\$0.0043781
332.	PROM	\$4.3251889
333.	PSG	\$5.8781611
334.	PSY	\$0.0233829
335.	PTU*	\$0.3702685
336.	PUNDIX	\$0.3642664
337.	PWV**	\$0.0000000
338.	PYTH	\$0.000000
339.	QASH*	\$0.0117486
340.	QBZ**	\$0.000000
341.	QI	\$0.0063072
342.	QKC	\$0.0078844
343.	QTUM	\$2.1935600
344.	RAMP	\$0.0287482
345.	RAY	\$0.2532873
346.	RBLX**	\$0.000000
347.	RBTC	\$16,871.6300000
348.	REAL	\$0.1050873
349.	REDI*	\$0.000000
350.	REEF	\$0.0034151
351.	REN	\$0.0824000
352.	RENBTC	\$16,476.6225011
353.	REP	\$5.1596083
354.	RFOX	\$0.0062973
355.	RIF	\$0.0387725
356.	RNDR	\$0.5381211
357.	ROOBEE	\$0.0009154
358.	ROOK*	\$12.2942799
359.	RSR	\$0.0042055
360.	RUNE	\$1.1476770
361.	SAL**	\$0.0000000
362.	SAND	\$0.6218413
363.	SECO	\$1.0001000
364.	SER	\$0.0105808
365.	SGN**	\$0.0000000
366.	SGR**	\$0.000000
367.	SHIB	\$0.0000098
368.	SHORT BIDEN TOKEN	\$0.0000000
369.	SHP**	\$0.000000
370.	SHPING	\$0.0049610
371.	SHX	\$0.0005588
372.	SIX**	\$0,000000

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	Asset	Price
	[A]	[B]
	Remaining Cryptocurrencies a	
373.	SKL	\$0.0269854
374.	SLND*	\$0.2972229
375.	SLP	\$0.0025947
376.	SLRS*	\$0.0033216
377.	SNIP**	\$0.0000000
378.	SNX	\$1.8312933
379.	SNY	\$0.0975026
380.	SOL	\$16.2471144
381.	SOLO	\$0.2279210
382.	SOS	\$0.0000002
383.	SPA	\$0.0069230
384.	SPDR*	\$0.0000650
385.	SPELL	\$0.0006802
386.	SPHTX**	\$0.000000
387.	SRM*	\$0.1551467
388.	SRX	\$0.0148499
389.	SSX	\$0.0149817
390.	STAC**	\$0.000000
391.	STACS**	\$0.000000
392.	STARS	\$0.0325200
393.	STEP*	\$0.0069923
394.	STETH	\$1,252.4649000
395.	STG*	\$0.3307143
396.	STMX	\$0.0048053
397.	STORJ	\$0.3129665
398.	STSOL	\$18.6929248
399.	STU**	\$0.000000
400.	STX	\$0.2255435
401.	SUN	\$0.0054091
402.	SUN OLD	\$0.0054091
403.	SUPER	\$0.1040800
404.	SUSHI	\$1.2374952
405.	SWEAT	\$0.0143510
406.	SXP	\$0.2289366
407.	SYL**	\$0.000000
408.	SYN*	\$0.4771438
409.	TAPT	\$5.3425111
410.	TEM**	\$0.0000000
411.	TFT**	\$0.000000
412.	THRT**	\$0.000000
413.	THX**	\$0.000000
414.	TLM	\$0.0157681
415.	TMTG	\$0.0000923
416.	TOMO	\$0.2907561
417.	TON	\$1.1965831
418.	TONCOIN	\$1.5482817
419.	TPAY**	\$0.000000

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	Asset	Price
	[A]	[B]
420	Remaining Cryptocurrencies and TPT	
420. 421.	TRL	\$0.0062374 \$0.0225543
421.	TRU	CONT. THE STATE OF
		\$0.0345301
423.	TRUMP_TOKEN	\$0.000000
424.	TRUMPFEBWIN	\$0.000000
425.	TRUMPGO TRUMPLOSE	\$1.000000
426.	TRUMPSTAY	\$1.000000
427.	TRUMPWIN	\$0.000000
428. 429.	TRX	\$0.000000
		\$0.0556107
430.	TTU** TULIP*	\$0.000000
431.		\$1.3862922
432.	UBT	\$0.1414271
433.	UBTC**	\$0.000000
434.	UBXT	\$0.0015159
435.	UKG**	\$0.000000
436.	UMEE	\$0.0083132
437.	UNI	\$5.7583446
438.	VET	\$0.0211672
439.	VFOX	\$0.0941208
440.	VGX	\$0.2295354
441.	VI**	\$0.000000
442.	VIDY	\$0.0000838
443.	VIDYX	\$0.0006897
444.	VIO**	\$0.000000
445.	VOY**	\$0.000000
446.	VUU**	\$0.000000
447.	VZT**	\$0.000000
448.	WABI	\$0.0624643
449.	WAVAX	\$6.000000
450.	WAVES	\$2,3262914
451.	WAXL	\$0.6885064
452.	WBTC	\$16,864.9139190
453.	WEMIX	\$1.4722348
454.	WFLOW	\$15.0000000
455.	WIN	\$0.000949
456.	WLO**	\$0.000000
457.	WOM	\$0.0302677
458.	WRX	\$0.1547882
459.	XCF*	\$0.0000000
460.	XDC	\$0.0271151
461.	XEM	\$0.0329337
462.	XES**	\$0.0000000
463.	XKI**	\$0.000000
464.	XLM	\$0.0938490
465.	XMR	\$125.5384776
466.	XNK**	\$0.0000000

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	Asset	Price
	[A]	[B]
467.	Remaining Cryptocurrencies and Tokens (e XNO	
467. 468.	XNO XPLA*	\$0.0083402
469.	XPR	\$0.0518939
	XPK XPT*	\$0.0019111
470. 471.	XRP	\$0.0000000
471.	XTZ	\$0.3762385
		\$1.0702000
473.	YFI	\$6,389.0679600
474.	YFII	\$1,903.5322345
475.	YGG	\$0.2386170
476.	ZCO**	\$0.0000000
477.	ZEC	\$38.3224320
478.	ZEN	\$10.1894779
479.	ZIL MANAGEMENT AND	\$0.0224346
480.	ZPR*	\$0.0000150
481.	ZRX	\$0.1830295
482.	ZWAP*	\$1.2803053
	Non-Marketable Assets - LOCKED Di	gital Assets
483.	ATLAS_IEF_LOCKED*	\$0.0016771
484.	BOBA_LOCKED*	\$0.1139502
485.	FIDA IEF LOCKED*	\$0.0761691
486.	FIDA LOCKED*	\$0.0959739
487.	LUNA2 LOCKED*	\$0.8444760
488.	MAPS IEF LOCKED*	\$0.0000000
489.	MAPS LOCKED*	\$0,0000000
490.	MEDIA LOCKED*	\$1.7526386
491.	MSRM LOCKED*	\$104,541.3398598
492.	OXY IEF LOCKED*	\$0.0000000
493.	OXY_LOCKED*	\$0.0000000
494.	POLIS IEF LOCKED*	\$0.1219276
495.	PYTH IEF LOCKED	\$0.0000000
496.	PYTH LOCKED	\$0.0000000
497.	RAY IEF LOCKED*	\$0.1777578
498.	SOL IEF LOCKED*	\$10.5284958
499.	SRM IEF LOCKED*	\$0.1042713
500.	SRM LOCKED*	\$0.1045413
501.	UBXT LOCKED	\$0.0015159
502.	USD IEF LOCKED*	\$0.8319019
		ψ0.0517017
	Non-Marketable Assets - CUSTOM	
503.	MAPS_CUSTOM (Customer ID 266388)*	\$0.0000000
504.	OXY_CUSTOM (Customer ID 266388)*	\$0.0000000
	OXY_CUSTOM (Customer ID 289114)*	\$0.0000000
	SRM_CUSTOM (Customer ID 289114)*	\$0.1046495
505.	SRM_CUSTOM (Customer ID 368185)*	\$0.1144301
	SRM_CUSTOM (Customer ID 374171)*	\$0.1044750
	SRM CUSTOM (Customer ID 408404)*	\$0.0999159

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	Asset	Price
	[A]	[B]
	Non-Marketable Assets - CUSTOM Tokens SRM CUSTOM (Customer ID 410499)*	\$0.0999159
	SRM CUSTOM (Customer ID 2588067)*	\$0.0977176
505.	SRM_CUSTOM (Customer ID 2791093)*	\$0.1044750
	SRM_CUSTOM (Customer ID 3064436)*	\$0.1144301
		V
	Non-Marketable Assets - Options	
506.	LOCKED_MAPS_STRIKE-0.07_VEST-2030-1*	\$0.0000000
	LOCKED_MAPS_STRIKE-0.07_VEST-2030-2*	\$0.0000000
507.	LOCKED_OXY_STRIKE-0.03_VEST-2030-1*	\$0.000000
	LOCKED_OXY_STRIKE-0.03_VEST-2030-2*	\$0.000000
508.	LOCKED_SRM_STRIKE-0.1_VEST-2030-1*	\$0.1165304
	LOCKED_SRM_STRIKE-0.1_VEST-2030-2*	\$0.1220657
Suda Herebia and the	FTX Equity Claims and FTT	
09.	FTT*	\$0.0000000
	FTT_CUSTOM (Customer ID 151162)*	\$0.0000000
	FTT_CUSTOM (Customer ID 160222)*	\$0.0000000
	FTT_CUSTOM (Customer ID 175907)*	\$0.0000000
510.	FTT_CUSTOM (Customer ID 205992)*	\$0.0000000
	FTT_CUSTOM (Customer ID 713123)*	\$0.0000000
	FTT_CUSTOM (Customer ID 1743405)*	\$0.0000000
	FTT_CUSTOM (Customer ID 1785423)*	\$0.0000000
511.	FTT_LOCKED*	\$0.0000000
12.	FTT_R3*	\$0.0000000
13.	FTT_STRIKE-0.4_EXERCISE-2030*	\$0.0000000
,13.	FTT_STRIKE-0.4_EXERCISE-2030*	\$0.0000000
14.	FTT_STRIKE-0.4_UNLOCK-EXPIRE-2030*	\$0.0000000
14.	FTT_STRIKE-0.4_UNLOCK-EXPIRE-2030*	\$0.0000000
15.	FTX_EQUITY*	\$0.0000000
16.	FTX_EQUITY_OPTIONS_PER_AWARD_AGR EEMENTS PENDING MAY 2021*	\$0.0000000
17.	FTX_EQUITY_STRIKE-2.28_VEST- 2022_EXPIRE-2030*	\$0.0000000
18.	WEST REALM EQUITY*	\$0.0000000
	WEST REALM EQUITY OPTIONS PER A	\$0.0000000
19.	WARD_AGREEMENTS_PENDING_MAY_202	
20.	WEST_REALM_EQUITY_POSTSPLIT*	\$0.0000000
21.	WEST_REALM_EQUITY_STRIKE-	\$0.0000000
41.	0.33_EXPIRE-2030*	
	Leveraged Tokens	
22.	ADABEAR	\$0.0000000
23.	ADABULL	\$0.1099645
24.	ADADOOM	\$0.0523066
25.	ADAHALF	\$26,457.7365100
26.	ADAHEDGE	\$8.3123883
27.	ADAMOON	\$0.2948852

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	Asset	Price
	[A]	[B]
528.	ALGOBEAR Leveraged To	kens (Cont.) \$0.000000
529.	ALGOBULL	\$0,000000
530.	ALGODOOM	\$0.0000000
531.	ALGOHALF	\$9,934,4971530
532.	ALGOHEDGE	\$49,6354567
533.	ALGOMOON	\$0.000000
534.	ALTBEAR	\$0.0000037
535.	ALTBULL	\$0.0987011
536.	ALTDOOM	\$0.0061345
537.	ALTHALF	\$14,833.9244500
538.	ALTHEDGE	\$86.3468666
539.	ALTMOON	\$0.0006003
540.	ASDBEAR	\$0.000000
541.	ASDBULL	\$0.000000
542.	ASDDOOM	\$0.0007073
543.	ASDHALF	\$6,989,2699420
544.	ASDHEDGE	\$0,989.2099420 \$17.3960638
545.	ASDMOON	\$0.0025923
546.	ATOMBEAR	
547.	ATOMBEAR	\$0.000000
548.	ATOMBOLL	\$0.000064
549.	ATOMBOOM	\$0.0253355
549. 550.	ATOMHALF	\$19,453.0853900
		\$8.4440723
551. 552.	ATOMMOON BALBEAR	\$0.0002407
553.	BALBULL	\$0.000001
	BALHALF	\$0.000239
554.		\$7,873.8791210
555.	BALHEDGE	\$53.0641831
556.	BCHBEAR	\$0.0000580
557.	BCHBULL	\$0.0000022
558.	BCHDOOM	\$0.0004450
559.	BCHHALF	\$5,049.9221550
560.	BCHHEDGE	\$404.1708021
561.	BCHMOON	\$0.0000000
562.	BEAR	\$0.0002263
563.	BEARSHIT	\$0.000008
564.	BNBBEAR	\$0.000000
565.	BNBBULL	\$31.3316250
566.	BNBDOOM	\$0.0135797
567.	BNBHALF	\$47,192.4636900
568.	BNBHEDGE	\$3.5969590
569.	BNBMOON	\$0.0013545
570.	BSVBEAR	\$0.0000019
571.	BSVBULL	\$0.000000
572.	BSVDOOM	\$0.0000000
573.	BSVHALF	\$3,590.5460510
574.	BSVHEDGE	\$247.1835878

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	Asset	Price
	[A]	[B]
E7E	Leveraged Toke BSVMOON	
575. 576.	BTC3S	\$0.000000 \$0.000000
577.	BTCSHORT	\$0.000000
578.	BULL	\$46.8805090
579.	BULLSHIT	
	BVOL	\$0.0408873 \$383.9608842
580.	COMPBEAR	
581.		\$0.0000002
582. 583.	COMPBULL COMPHALE	\$0.0000014
		\$6,845.7817960
584.	COMPHEDGE	\$83.8036923
585.	CUSDTBEAR	\$11,590.3414900
586.	CUSDTBULL	\$4,946.0920590
587.	CUSDTHALF	\$5,204.3890910
588.	CUSDTHEDGE	\$5,807.4255260
589.	DEFIBEAR	\$0.0001389
590.	DEFIBULL	\$0.0045419
591.	DEFIHALF	\$8,325.7783530
592.	DEFIHEDGE	\$193.5035105
593.	DMGBEAR	\$0.0000187
594.	DMGBULL	\$0.0000000
595.	DMGHEDGE	\$245.4960819
596.	DOGEBEAR	\$0.000000
597.	DOGEBEAR2021	\$0.0463891
598.	DOGEBULL	\$0.0244994
599.	DOGEDOOM	\$13.5655226
600.	DOGEHALF	\$91,967.0139400
601.	DOGEHEDGE	\$0.3192268
602.	DOGEMOON	\$0.1555753
603.	DOOM	\$19.9254775
604.	DOOMSHIT	\$0.0385002
605.	DRGNBEAR	\$0.000021
606.	DRGNBULL	\$0.0211301
607.	DRGNDOOM	\$1.7276392
608.	DRGNHALF	\$15,076.9989900
609.	DRGNHEDGE	\$54.0990188
610.	DRGNMOON	\$0.0187552
611.	EOSBEAR	\$0.000018
612.	EOSBULL	\$0.000001
613.	EOSDOOM	\$0.000001
614.	EOSHALF	\$4,759.4851730
615.	EOSHEDGE	\$179.8087441
616.	EOSMOON	\$0.000001
617.	ETCBEAR	\$0.000000
618.	ETCBULL	\$0.0024248
619.	ETCDOOM	\$0.000000
620.	ETCHALF	\$21,221.9104600
621.	ETCHEDGE	\$8.2806052

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Leveraged Tokens (CON) R L M F GE ON AR LL OM LF DGE	[B] Cont.) \$0.0000017 \$0.0000000 \$0.0000000 \$0.0000000 \$2.4760575 \$0.0016732 \$18,469,7957700 \$18.4207875 \$0.0000019 \$0.0000972 \$295.1514787 \$0.1860545
R L M F GE N AR LL OM LL OM	\$0.0000017 \$0.0000000 \$0.0000000 \$0.0000000 \$2.4760575 \$0.0016732 \$18,469,7957700 \$18.4207875 \$0.0000019 \$0.0000972 \$295.1514787
R L M F GE ON AR LL OM LF	\$0.0000000 \$0.0000000 \$0.0000000 \$2.4760575 \$0.0016732 \$18,469,7957700 \$18.4207875 \$0.0000019 \$0.0000972 \$295.1514787
L M F GE N N AR LL OM LF	\$0.000000 \$0.0000000 \$2.4760575 \$0.0016732 \$18,469.7957700 \$18.4207875 \$0.0000019 \$0.0000972 \$295.1514787
L M F GE N N AR LL OM LF	\$0.0000000 \$2.4760575 \$0.0016732 \$18,469.7957700 \$18.4207875 \$0.0000019 \$0.0000972 \$295.1514787
L M F GE N N AR LL OM LF	\$2.4760575 \$0.0016732 \$18,469.7957700 \$18.4207875 \$0.0000019 \$0.0000972 \$295.1514787
M F GE DN AR LL OM LF	\$0.0016732 \$18,469.7957700 \$18.4207875 \$0.0000019 \$0.0000972 \$295.1514787
F GE DN AR LL OM LF	\$18,469.7957700 \$18.4207875 \$0.0000019 \$0.0000972 \$295.1514787
GE N AR LL OM LF	\$18.4207875 \$0.0000019 \$0.0000972 \$295.1514787
ON AR LL OM LF	\$0.0000019 \$0.0000972 \$295.1514787
AR LL OM LF	\$0.0000972 \$295.1514787
LL OM LF	\$295.1514787
OM LF	
LF	\$0.1860545
	#15 055 5146000
DGE	\$17,375.5146000
011	\$84.8886955
OON	\$5.3614867
R	\$0.0000167
	\$0.0000003
	\$10,559.2005400
	\$17,491.1907500
	\$139.4945515
HIT	\$41.6002097
	\$0.0001351
	\$0.0716140
1	\$0.000004
	\$9,217.4647730
Е	\$152.3190431
	\$0.0024429
•	\$0.0000000
	\$3,783.7281240
EAR	\$2,090.2842430
R	\$0.0000002
L	\$0,0000155
F	\$5,886,9490350
GE	\$100.4984535
(\$0.0541314
	\$296.0310385
	\$1,245.0328410
	\$14,692.5310700
	\$416.1034786
	\$10.0705551
	\$0.000000
	\$0.0001093
	\$0.0001093
	\$12,059,6325400
	\$12,039.6323400
	\$0.0152255
	\$0.0000615
	R L F GE R L M F GE ON L L DM LF DGE ON R

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	Asset	Price	
	[A]	[B]	
669.	Leveraged Toke		
670.	LTCDOOM	\$0.0000851	
To be considerable to the same		\$0.0030877	
671.	LTCHALF	\$8,769.4548190	
672.	LTCHEDGE	\$350.0723044	
673.	LTCMOON	\$0.000020	
674.	MATICBEAR	\$0.000000	
675.	MATICBEAR2021	\$0.0000022	
676.	MATICBULL	\$0.0003941	
677.	MATICDOOM	\$0.000000	
678.	MATICHALF	\$83,551.6928100	
679.	MATICHEDGE	\$0.0633150	
680.	MATICMOON	\$0.0000000	
681.	MIDBEAR	\$0.0000945	
682.	MIDBULL	\$0.3459609	
683.	MIDDOOM	\$0.0056389	
684.	MIDHALF	\$11,723.2535300	
685.	MIDHEDGE	\$123.1185961	
686.	MIDMOON	\$0.0430683	
687.	MKRBEAR	\$0.000003	
688.	MKRBULL	\$0.0671530	
689.	MKRHALF	\$12,145.3183000	
690.	MKRHEDGE	\$50.0188578	
691.	MOON	\$0.0526138	
692.	MOONSHIT	\$0.0205360	
693.	OKBBEAR	\$0.000000	
694.	OKBBULL	\$0.8581410	
695.	OKBDOOM	\$0.000000	
696.	OKBHALF	\$21,894.0791500	
697.	OKBHEDGE	\$6.1667638	
698.	OKBMOON	\$0.0321605	
699.	PAXGBEAR	\$9,701.5780080	
700.	PAXGBULL	\$3,484.0791990	
701.	PAXGHALF	\$5,207.0757900	
702.	PAXGHEDGE	\$5,346.6198310	
703.	PRIVBEAR	\$0.000001	
704.	PRIVBULL	\$0.0231324	
705.	PRIVHALF	\$9,339.6864750	
706.	PRIVHEDGE	\$291.5226786	
707.	SUSHIBEAR	\$0.000000	
708.	SUSHIBULL	\$0.000000	
709.	SUSHIHALF	\$6,529.6163500	
710.	SUSHIHEDGE	\$20.0885420	
711.	SXPBEAR	\$0.0000000	
712.	SXPBULL	\$0.0000000	
713.	SXPHALF	\$5,393,0349640	
714.	SXPHEDGE	\$86.1083925	
715.	THETABEAR	\$0.000000	

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	Asset	Price
	[A]	[B]
716.	Leveraged Toke THETABULL	ns (Cont.) \$0.0004096
717.	THETAHALF	\$14,122.6296600
718.	THETAHEDGE	\$21.0005876
719.	TOMOBEAR	\$0.000000
720.	TOMOBEAR2021	\$0.0000049
721.	TOMOBULL	\$0.0000049
722.	TOMODOOM	\$0.000000
723.	TOMOHALF	
724.	TOMOHEDGE	\$8,973.4768520 \$10.5818576
725.	TOMOMOON	
726.	TRXBEAR	\$0.000000
727.	TRXBULL	\$0.000000
		\$0.0091679
728.	TRXDOOM	\$0.000000
729.	TRXHALF	\$17,261.7622800
730.	TRXHEDGE	\$37.7394181
731.	TRXMOON	\$0.000001
732.	TRYBBEAR	\$2,188.1014370
733.	TRYBBULL	\$1,905.2635810
734.	TRYBHALF	\$6,102.3209960
735.	TRYBHEDGE	\$3,975.9875420
736.	UNISWAPBEAR	\$0.0088776
737.	UNISWAPBULL	\$0.0173830
738.	UNISWAPHALF	\$4,722.3967030
739.	UNISWAPHEDGE	\$801.9195961
740.	USDTBEAR	\$3,058.7365350
741.	USDTBULL	\$10,869.6297300
742.	USDTDOOM	\$6,025.7912030
743.	USDTHALF	\$6,168.4232660
744.	USDTHEDGE	\$3,827.2826750
745.	USDTMOON	\$5,535.0918740
746.	VETBEAR	\$0.0000013
747.	VETBULL	\$0.0000482
748.	VETHALF	\$7,881.8207010
749.	VETHEDGE	\$95.5379331
750.	XAUTBEAR	\$4,535.0413900
751.	XAUTBULL	\$4,282.0145160
752.	XAUTHALF	\$5,635.9334290
753.	XAUTHEDGE	\$4,684.9190310
754.	XLMBEAR	\$0.0108123
755.	XLMBULL	\$0.0010346
756.	XRPBEAR	\$0.000000
757.	XRPBULL	\$0.0000129
758.	XRPDOOM	\$0.0992402
759.	XRPHALF	\$12,340.2866700
760.	XRPHEDGE	\$43.5051964
761.	XRPMOON	\$0.0000973
762.	XTZBEAR	\$0.0000973

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	Asset	Price
	[A]	[B]
763.	Leveraged Tok XTZBULL	\$0.000058
764.	XTZDOOM	\$0.0000070
765.	XTZHALF	\$5,426,9375860
766.	XTZHEDGE	\$80.0613995
767.	XTZMOON	\$2.1647956
768.	ZECBEAR	\$0.0022051
769.	ZECBULL	\$0.0000600
	Tokenized	Stocks
770.	AAPL	\$164.1105734
771.	ABNB	\$96.0000000
772.	ACB	\$0.9999615
773.	AMC	\$2.3736839
774.	AMD	\$71.5300000
775.	AMZN	\$141.0000000
776.	AMZNPRE**	\$0.0000000
777.	APEAMC	\$2.8312387
778.	APHA	\$3,3000000
779.	ARKK	\$36.7500000
780.	BABA	\$69.6482759
781.	BB	\$4,3800000
782.	BILI	\$11.5000000
783.	BITO	\$141.1510000
784.	BITW	\$654.0250000
785.	BNTX	\$130.0069841
786.	BYND	\$10.0000000
787.	CBSE**	\$0.000000
788.	CGC	\$1.9770210
789.	COIN	\$30.0000000
790.	CRON	\$3.5830000
791.	DKNG	\$10.2000000
792.	ЕТНЕ	\$9.9990000
793.	FB	\$118,000000
794.	GBTC	\$8.4053969
795.	GDX	\$28.0000000
796.	GDXJ	\$34.6500000
797.	GLD	\$164.000000
798.	GLXY	\$2.8534083
799.	GME	\$21.7725000
800.	GMEPRE**	\$0.000000
801.	GOOGL	\$140.000000
802.	GOOGLPRE**	\$0,000000
803.	HOOD	\$8.900000
804.	HOOD PRE**	\$0.000000
805.	MRNA	\$162.2837500
806.	MSTR	\$176.0022727
807.	NFLX	\$176.0022727 \$221.5600000

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	Asset	Price
	[A] Tokenized Stoc	[B]
808.	NIO	\$7.1215967
809.	NOK	\$192.0000000
810.	NVDA	\$179,2500000
811.	NVDA PRE**	\$0,0000000
812.	PENN	\$35.0360000
813.	PFE	\$57.0000000
814.	PYPL	\$82,7457524
815.	SLV	\$21,0000000
816.	SPY	\$395.2800000
817.	SQ	\$68.4769563
818.	TLRY	\$1.0888269
819.	TSLA	\$218,9500000
820.	TSLAPRE**	\$0.000000
821.	TSM	\$86.2900000
822.	TWTR	\$54.2000000
823.	UBER	\$20.0350000
824.	USO	\$139,3253569
825.	WNDR	\$0.1800000
826.	ZM	\$87.9242857
027	Spot+ Derivative.	
827.	IINCH AAVE	\$0.5506265
828.		\$63.9206190
829.	AGLD	\$0.2463000
830.	AKRO	\$0.0026846
831.	ALCX	\$17.5644480
832.	ALEPH	\$0.0634082
833.	ALGO	\$0.2959040
834.	ALICE	\$1.1828905
835.	ALPHA	\$0.0912154
836.	ANC	\$0.0531424
837.	APE	\$3.1755724
838.	APT	\$4.7424485
839.	ASD	\$0.0667762
840.	ATLAS	\$0.0029998
841.	ATOM	\$11.5991618
842.	AUDIO	\$0.1566829
843.	AURY	\$0.5119689
844.	AVAX	\$14.1912756
845.	AXS	\$6.8561913
846.	BADGER	\$2.6147338
847.	BAL	\$5.2393950
848.	BAND	\$2.2614453
849.	BAO	\$0.0001056
850.	BAR	\$3.9021409
851.	BAT	\$0.2526885
852.	BCH	\$102.2131116

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	Asset	Price
	[A]	[B]
853.	Spot+ Derivativ BF POINT**	es (EU Only) (Cont.) \$0.0000000
854.	BICO	\$0.2864203
855.	BIT	\$0.3165593
856.	BLT	\$0.0418393
857.	BNB	\$286.5200580
858.	BNT	\$0.3792324
859.	BOBA	\$0.3792324
860.	BTC	\$16,871.6300000
861.	BTT	
862.	C98	\$0.000007
863.	CEL	\$0.2040890
864.	CHR	\$0.6219474
865.	CHZ	\$0.1122728
		\$0.2197552
866.	CITY	\$4.6107138
867.	CLV	\$0.0598594
868.	COMP	\$37.9232400
869.	CONV	\$0.0005770
870.	COPE	\$0.0063050
871.	CQT	\$0.0874388
872.	CREAM	\$6.8911210
873.	CRO	\$0.0875500
874.	CRV	\$0.6516809
875.	CTX	\$2.2718017
876.	CUSDT	\$0.0218002
877.	CVC	\$0.0911835
878.	CVX	\$4.0218594
879.	DAWN	\$0.7468876
880.	DENT	\$0.0006846
881.	DFL	\$0.0011693
882.	DMG	\$0.0091086
883.	DODO	\$0.1128715
884.	DOGE	\$0.0828523
885.	DOT	\$5.6705792
886.	DYDX	\$1.9869782
887.	EDEN	\$0.0804372
888.	EMB	\$0.0192000
889.	ENJ	\$0.3445027
890.	ENS	\$12.2252550
891.	ETH	\$1,258.8400000
892.	ETHW	\$4.1505988
893.	EUL	\$6.1800531
894.	FIDA	\$0.2303338
895.	FRONT	\$0.1701556
896.	FTM	\$0.1917738
897.	FXS	\$5.1236807
898.	GAL	\$1.5049689
899.	GALA	\$0.0308076

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	Asset	Price
	[A]	[B]
000	Spot+ Derivatives	
900.	GARI	\$1.6386832
901.	GARI	\$0.0375240
902.	GENE	\$1.7487763
903.	GMT	\$0.3851205
904.	GMX	\$32.5640874
905.	GODS	\$0.2403136
906.	GOG	\$0.1030913
907.	GRT	\$0.0644695
908.	GST	\$0.0259475
909.	GT	\$3.8283511
910.	HBB	\$0.0645693
911.	HGET	\$0.3483396
912.	HMT	\$0.0503377
913.	HNT	\$2.8245828
914.	HOLY	\$1.2800000
915.	HT	\$5.6096533
916.	HUM	\$0.0753202
917.	HXRO	\$0.0527828
918.	IMX	\$0.4485000
919.	INDI	\$0.1317318
920.	INTER	\$2.2220025
921.	IP3	\$0.2929130
922.	JET	\$0.0754000
923.	JOE	\$0.1576808
924.	JST	\$0.0226663
925.	KBTT	\$0.0007129
926.	KIN	\$0.0000092
927.	KLUNC	\$0.1877101
928.	KNC	\$0.5928001
929.	KSHIB	\$0.0097500
930.	KSOS	\$0.0001771
931.	LDO	\$1.1764306
932.	LEO	\$4.0838828
933.	LINA	\$0.0061216
934.	LINK	\$6.7932499
935.	LOOKS	\$0.1468043
936.	LRC	\$0.2596744
937.	LTC	\$60.6106000
938.	LUA	\$0.0127744
939.	LUNA2	\$1.6770056
940.	LUNC	\$0.0001877
941.	MAGIC	\$0.2734465
942.	MANA	\$0.4919000
943.	MAPS	\$0.0985383
944.	MASK	\$3.3033138
945.	MATH	\$0.1112000
946.	MATIC	\$1.0265325

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	Asset	Price
	[A]	[B]
947.	Spot+ Derivatives MBS	(EU Only) (Cont.) \$0.0898182
948.	MCB	\$4,3032898
949.	MEDIA	\$4.7500000
950.	MER	\$0.0078455
951.	MKR	\$780.1942307
952.	MNGO	\$0.0123275
953.	MOB	\$0.6213997
954.	MPLX	\$0.0635720
955.	MTA	
956.	MTL	\$0.0388458 \$0.6666573
957.	MYC	\$0.0304800
958.	NEAR	\$2.1160000
959.	NEXO	\$0.7285254
960.	OKB	\$19.0903594
961.	OMG	\$1.2318000
962.	ORBS	\$0.0246122
963.	ORCA	\$0.4958000
964.	OXY	\$0.0314364
965.	PEOPLE	\$0.0320352
966.	PERP	\$0.4211518
967.	POLIS	\$0.2158631
968.	PORT	\$0.0289414
969.	PRISM	\$0.0043781
970.	PROM	\$4.3251889
971.	PSG	\$5.8781611
972.	PSY	\$0.0233829
973.	PTU	\$0.8981820
974.	PUNDIX	\$0.3642664
975.	QI	\$0.0063072
976.	RAMP	\$0.0287482
977.	RAY	\$0.2532873
978.	REAL	\$0.1050873
979.	REEF	\$0.0034151
980.	REN	\$0.0824000
981.	RNDR	\$0.5381211
982.	ROOK	\$14.2065247
983.	RSR	\$0.0042055
984.	RUNE	\$1.1476770
985.	SAND	\$0.6218413
986.	SECO	\$1,0001000
987.	SHIB	\$0.000098
988.	SKL	\$0.0269854
989.	SLND	\$0.3878150
990.	SLP	\$0.0025947
991.	SLRS	\$0.0039720
992.	SNX	\$1.8312933
993.	SNY	\$0.0975026

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	Asset	Price
	[A]	[B]
994.	Spot+ Derivatives (\$16.2471144
995.	SOS	\$0.0000002
996.	SPA	\$0.0069230
997.	SPELL	\$0.0006802
998.	SRM	\$0.3722465
999.	STARS	\$0.0325200
1000.	STEP	\$0.0080138
1001.	STG	\$0.3901143
1002.	STMX	\$0.0048053
1003.	STORJ	\$0.3129665
1004.	SUN	\$0.0054091
1005.	SUSHI	\$1,2374952
1006.	SWEAT	\$0.0143510
1007.	SXP	\$0.2289366
1008.	SYN	\$0.5850000
1009.	TLM	\$0.0157681
1010.	TOMO	\$0.2907561
1011.	TONCOIN	\$1.5482817
1012.	TRU	\$0.0345301
1012.	TRX	\$0.0556107
1014.	TULIP	\$1.6566468
1015.	UBXT	\$0.0015159
1016.	UMEE	\$0.0013139
1017.	UNI	\$5.7583446
1017.	VGX	\$0,2295354
1019.	WAVES	\$2.3262914
1020.	WRX	\$0.1547882
1020.	XPLA	\$0.2911263
1021.	XRP	\$0.3762385
1022.	YFI	\$6,389,0679600
1023.	YFII	
1024.	YGG	\$1,903.5322345 \$0.2386170
1025.	ZRX	\$0.1830295
1020.	ZRA	\$0.1630293
	Futu	
1027.	1INCH-1230	\$0.4721000
1028.	IINCH-PERP	\$0.5214000
1029.	AAPL-1230	\$37.0000000
1030.	AAVE-1230	\$67.0300000
1031.	AAVE-PERP	\$63.4500000
1032.	ABNB-1230	\$121.2100000
1033.	ACB-1230	\$0.3300000
1034.	ADA-1230	\$0.3762000
1035.	ADA-PERP	\$0.3517000
1036.	AGLD-PERP	\$0.2330500
1037.	ALCX-PERP	\$16.0075000
1038.	ALGO-1230	\$0.3081500

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	Asset	Price
	[A] Futures ((B)
1039.	ALGO-PERP	\$0.3022000
1040.	ALICE-PERP	\$1.0097500
1041.	ALPHA-PERP	\$0.0895000
1042.	ALT-1230	\$1,817.8000000
1043.	ALT-PERP	\$1,817.0000000
1044.	AMC-1230	\$6.6562500
1045.	AMD-1230	\$59.2200000
1046.	AMPL-PERP	\$0.9584000
1047.	AMZN-1230	\$85.0000000
1048.	ANC-PERP	\$0.1469765
1049.	APE-1230	\$2.6280000
1050.	APE-PERP	\$3.1415000
1051.	APT-PERP	\$4.5700000
1051.	AR-PERP	\$9.500000
1052.	ARKK-1230	\$9.3000000
	ASD-PERP	
1054.	ATLAS-PERP	\$0.0430000
1055.		\$0.0017165
1056.	ATOM-1230	\$18.5000000
1057.	ATOM-PERP	\$11.6225000
1058.	AUDIO-PERP	\$0.1506500
1059.	AVAX-1230	\$12.8000000
1060.	AVAX-PERP	\$12.7420000
1061.	AXS-1230	\$6.8659095
1062.	AXS-PERP	\$6.8920000
1063.	BABA-1230	\$67.3111523
1064.	BADGER-PERP	\$2.7460000
1065.	BAL-1230	\$5.5250000
1066.	BAL-PERP	\$5.0950000
1067.	BAND-PERP	\$2.0286000
1068.	BAT-PERP	\$0.2461000
1069.	BB-1230	\$4.6950000
1070.	BCH-1230	\$103.5600000
1071.	BCH-PERP	\$104.5767209
1072.	BILI-1230	\$12.0000000
1073.	BIT-PERP	\$0.3137500
1074.	BITO-1230	\$10.8300000
1075.	BITW-1230	\$94.0000000
1076.	BNB-1230	\$344.0000000
1077.	BNB-PERP	\$375.6250000
1078.	BNT-PERP	\$0.3659500
1079.	BNTX-1230	\$166.2300000
1080.	BOBA-PERP	\$0.4177500
1081.	BRZ-PERP	\$0.2079946
1082.	BSV-1230	\$40.3700000
1083.	BSV-PERP	\$38.400000
1084.	BTC-0331	\$16.884.4589309
1085.	BTC-1230	\$17,458.0000000